

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

08-CV-00876 (RMB)

- against -

ECF CASE

INVESTCORP BANK B.S.C., et al.,

Defendants.

**AFFIDAVIT OF STEVEN P. RICHMAN IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

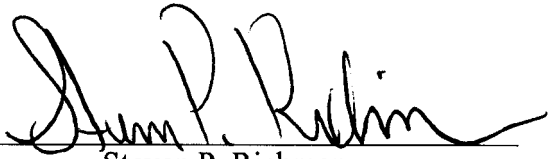
STATE OF WISCONSIN     )  
                                      ) ss.:  
COUNTY OF WAUKESHA )

STEVEN P. RICHMAN, being duly sworn, deposes and says:

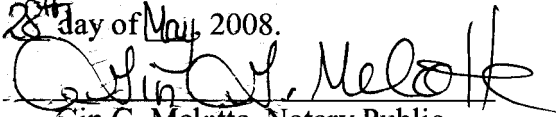
1. I submit this affidavit in support of the portion of Defendants' Motion to Dismiss seeking dismissal of the claims brought against me on the grounds that this Court lacks jurisdiction over my person.

2. From January 4, 2005 to December 2005, I served as President and Chief Executive Officer and as a Director of Werner Holding Co. (PA) and Werner Holding Co. (DE) (collectively "Holding Companies").

3. While I was an officer and director of the Holding Companies, I had offices in Illinois and Pennsylvania, and I resided in Illinois and Pennsylvania. I currently reside in Illinois and work in Wisconsin.

  
Steven P. Richman

Sworn to before me this  
28<sup>th</sup> day of May, 2008.

  
Gin G. Melotte, Notary Public

My commission expires on  
August 21, 2011

AFFIDAVIT OF SERVICE

STATE OF NEW YORK     )  
  : ss.:  
COUNTY OF NEW YORK    )

Kenneth J. Horrmann, being duly sworn, deposes and says:

1. I am not a party to the action, am over 18 years of age and am employed by  
Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, NY 10036.

2. On June 2, 2008, I served the following:

- *Notice of Motion,*
- *Opening Memorandum of Law in Support of Defendants' Joint Motions to Transfer Venue and to Dismiss the Complaint,*
- *Declaration of Michael D. Brooks,*
- *Declaration of Anthony W. Clark,*
- *Declaration of David M. Conn,*
- *Declaration of Daniel M. DiDomenico,*
- *Declaration of John J. Dylik,*
- *Declaration of Christopher G. Filardi,*
- *Declaration of Bruce B. Fischer,*
- *Declaration of Karen R. Garcell,*
- *Declaration of Vincent J. Garcell,*
- *Declaration of Edward W. Gericke,*
- *Declaration of Timothy K. Lewis,*
- *Declaration of Neal R. Martin,*
- *Declaration of Lisa A. Pressler,*
- *Declaration of John M. Remmers,*
- *Affidavit of Steven P. Richman,*
- *Declaration of Christopher J. Stadler,*
- *Declaration of Gary Stewart,*
- *Declaration of Thomas J. Sullivan,*
- *Declaration of Gregory W. Werkheiser,*
- *Declaration of Eric J. Werner; and*
- *Declaration of Michael S. Wong*

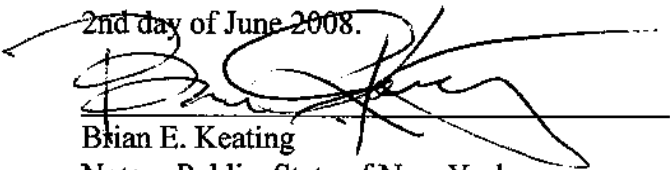
by first-class mail by depositing same in a post-paid properly addressed envelope, in an official  
depository under the exclusive care and custody of the U.S. Postal Service within the State of  
New York upon:

Kevin C. Walz  
8045 Bainbrook Drive  
Chagrin Falls, OG 44023

David A. Cardillo  
23 St. Glory Road  
Greenville, PA 16125

Kenneth J. Horrmann  
Kenneth J. Horrmann

Sworn to before me this  
2nd day of June 2008.

  
\_\_\_\_\_  
Brian E. Keating  
Notary Public, State of New York  
No. 01KE5009535  
Qualified in Westchester County  
Certificate Filed in New York County  
Commission Expires March 15, 2011